Joseph W. Carbonaro, Esq.

880 Third Avenue, 5th Floor New York, NY 10022 T 212-888-5200 F 212-898-0394 E joe@jcarbonarolaw.com



Westchester Office

Page 1 of 1

Page 1 of 1

2 Overhill Road, Suite 400 Scarsdale, NY 10583 T 914-222-9141 F 914-840-1298

September 13, 2024

Hon. Kenneth Karas
United States District Court Judge
Southern District of New York
The Charles Brient Federal Building and Courthouse
300 Quarrapos Street
White Plains, New York

Re: Bennett-Conroy v. Mount Vernon City School District et al Civil Action No.: 24-cv-6120 (KMK)

Dear Judge Karas:

This office is counsel to the Petitioner in the above proceeding. I write jointly on behalf of the parties pursuant to the Court's March 11, 2025 Order requesting a proposed case management order and discovery schedule.

As the Court will recall, this matter appeared before Your Honor for the sole purpose of seeking a stay of arbitration between the parties. That motion was denied without prejudice on October 2, 2024. Since that time, the parties have been actively engaged in the arbitration hearing process which is expected to conclude by the end of this month. We respectfully request that the Court adjourn the initial conference until a date in early April, at which time the parties expect to stipulate to discontinue this action, without need for further intervention by the Court. In the event that the government hands down an indictment or takes other action against the Petitioner between now and when the arbitration testimony concludes, we will so advise the Court and seek a further hearing on the motion for the stay.

Granted. The Parties to are submit a status report by April 15, 2025.

2/1//25

o Ordered.

seph W. Carbonaro

Respectfully yours.

cc: Devereau Cannick, Esq. (via ECF)
Jose Baez, Esq.